V. TRAINING

☐ Station resources and/or needs will be such that we will be unable or do not choose to institute programs for upgrading the skills of employees.

☒ We will provide on-the-job training to upgrade the skills of employees.

☒ We will provide assistance to students, schools, or colleges in programs designed to enable qualified minorities and women to compete in the broadcast employment market on an equitable basis:

School or Other Beneficiary	Proposed Form of Assistance
Rotation of programs among schools and colleges identified above.	Student Internships

☐ Other (specify)

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the application requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers, and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

EXHIBIT 1

Media Interests

James H. Dowdy, Barbara J. Norris, M. Steven C. Williams, John Ward, and Aaron O. Wells were stockholders and directors in Magna Media Corporation, an applicant for new AM and FM stations in New York, NY (File Nos. BP-830427AB and BPH-830427AB). Mr. Dowdy was President and Ms. Norris Vice President of that applicant, whose FM application was dismissed by the Commission pursuant to a settlement agreement on May 17, 1989, and the AM application was dismissed by the Commission pursuant to a settlement agreement on July 26, 1989.

Mr. Dowdy has a 49% ownership interest in and is associate publisher of the New York Voice, a weekly newspaper in New York, NY, which interest he will divest in the event of grant of this application (see Exhibit 2).

Clarence O. Smith has a less than five percent (5%) ownership interest in Queen City III Limited Partnership, which owns 98% of the stock in Queen City Broadcasting, Inc., which in turn is the sole stockholder in Queen City Broadcasting of New York, Inc., licensee of television station WKBW, Buffalo, New York. Edward Lewis also owns and controls less than five percent (5%) ownership interest in Queen City III Limited Partnership. According to information on file at the Commission in the WKBW ownership report file, the ownership interests of Messrs. Smith and Lewis are designated as General

Partnership units, but the partnership is governed by a Management Committee of eleven persons. Mr. Smith is not on the Management Committee. Mr. Lewis is on the Management Committee and is on the Board of Directors of Queen City Broadcasting, Inc. and Queen City Broadcasting of New York, Inc.

With regard to interests of immediate family members, the questions on the form appear to be limited to those in the same area as the application. However, in the interest of completeness, it is reported that the wife (Barbara Evans-Williams) and mother (Dolores Clark Williams) of M. Steven C. Williams each own less than five percent (5%) of preferred, non-voting stock in Granite City Broadcasting Corporation, licensee of television station KNTV, San Jose, CA, WPTA, Fort Wayne, IN, WEEK-TV, Peoria, IL, and KBJR-TV, Duluth, MN.

EXHIBIT 2

Divestiture Statement

In the event of grant of the subject application of Class Entertainment and Communications, L.P., James H. Dowdy will divest himself of all ownership interests in and sever all relationship with New York Voice newspaper.

EXHIBIT 3

Programming Statement

Class Entertainment and Communications, L.P. (Class) will provide a quality format of classical music and fine arts programming. The applicant is cognizant of the controversy engendered by the type and style of classical music broadcast by the present licensee of WNCN, and Class is committed to a thorough review of such programming, with particular emphasis upon the views and opinions of the public and groups such as the Listener's Guild.

Within the context of its format, Class will broadcast news, informational, and public service programming emphasizing such illustrative issues as the needs for funding and support of classical music and fine arts educational programs in the schools and enabling young people to participate in and/or gain appreciation of classical music, the range of environmental issues such as beach erosion, marine and waterfront development issues, and use of alternative fuels, the question of ethnic diversity, historical perspective, and how the arts can bridge cultural differences. The station will provide exposure for young composers, will profile up and

EXHIBIT 4

Integration Statement

Each of the three General Partners in Class Entertainment and Communications, L.P. will be integrated in the management of the proposed station as follows.

James H. Dowdy will be General Manager of the station, working in that capacity a minimum of twenty hours per week. His resposibilities will be as follows:

> Chief executive officer, approves all policy decisions, budgets, personnel practices, format revisions. Sets compensation levels and approves hiring and firing of department heads. Handles any union negotiations. Approves capital expenditures, negotiates leases. Supervises business manager and operations manager.

Barbara J. Norris will be Operations Manger of the station, working in that capacity full-time, i.e., a minimum of forty hours per week. Her responsibilities will be as follows:

> Supervises the station's programming, traffic, and technical operations. Reports to general manager. Hires program and traffic personnel, prepares departmental budgets for general manager's approval. Responsible for public file. Handles complaints from listeners. The station's program director, promotion manager, news and public affairs director, traffic manager and chief engineer report to the operations manager.

M. Steven C. Williams will be Business Manager of the station, working in that capacity full-time, i.e., a minimum of forty hours per week. His responsibilities will be as follows:

> Supervises the station's sales and accounting functions, serves as chief financial officer. Responsible for billing and collection of receivables, maintaining bank accounts, and payment of

accounts payable. Sets sales department quotas in consultation with sales manager, hires and fires sales personnel. In charge of clerical and accounting personnel. Reports to the general manager.

Enhancement credit will be sought on the basis that each of the three General Partners is minority (Black), and in the case of Ms. Norris, female. Additional credit will be sought on the basis of civic activities in the city of license by each of the three General Partners, and local residence as follows.

James H. Dowdy. From 1932-1972 exclusive residence in New York City. From 1972 until present primary residence is in New York City, with secondary residence in Paterson, New Jersey within the applicant's proposed city grade contour.

Barbara J. Norris. Resident of New York City for the past thirty-four years.

M. Steven C. Williams. Resident of New York City since 1979, and during the periods 1953-1971 and 1975-1977.

RF PROJECTS corporation

TECHNICAL EXHIBIT

APPLICATION FOR CONSTRUCTION PERMIT

CLASS ENTERTAINMENT AND COMMUNICATIONS, L.P.

NEW YORK, NEW YORK

CHANNEL 282B 3.6 kW 432 M

March 29, 1991

4917 Waters Edge Drive, Suite 230
Raleigh, North Carolina 27606
919·851·5466
Fax 919·851·5782

Statement

The Technical Exhibit of which this statement is a part was prepared on behalf of Class Entertainment and Communications, L.P. ("Class"), applicant for a new FM station to operate on channel 282B in New York, New York. Class' application is mutually exclusive with an application for renewal of license for WNCN(FM), New York, New York.

With this application, Class proposes to transmit from One World Trade Center ("WTC"), rather than use WNCN(FM)'s existing transmitter site at the Empire State Building ("Empire"). At WTC, the applicant proposes to utilize the existing master FM antenna system.

It is believed that this application fully complies with all applicable FCC Rules.

RF PROJECTS corporation

Proposed Antenna Location

Most of the FM stations licensed to New York City transmit from either Empire or WTC. Both buildings operate master FM antenna systems that are designed to combine several transmitters into a common antenna and have become de facto antenna farms. WNCN(FM) currently operates from Empire. Class approached Empire for permission to specify that building as a transmitter site, but building management refused permission because it did not wish to jeopardize relations with an existing tenant. Class then approached WTC management and, after considerable negotiations, obtained reasonable assurance of site availability. The WTC site is the best available site. Its master antenna is able to accommodate Class' proposed facility with only minor modifications to the combining system. As demonstrated elsewhere, Class' proposal fully complies with §73.213(a) of the Commission's rules.

The existing two-bay master FM antenna is mounted at the 23.5 meter level on a 91.5 meter mast at the top of the WTC. The mast and antenna has been previously studied and approved by the FAA in their study 68-NYC-285-OE. Under existing rules, no further approval by the FAA is required. A sketch of the building, antenna, and mast combination is included as Figure 1. The geographic coordinates of the antenna system are:

40° 42' 43" North Latitude
73° 00' 49" West Longitude

The Jersey City quadrangle map showing the proposed site and vicinity is included herein as Figure 2.

The following FM stations are currently operating from WTC: WKCR, WPAT, WNYC, WQCD, and WYNY. Existing television stations are: WCBS, WNBC, WNYW, WABC, WWOR, WPIX, WNET, WNYC, WXTV, and WNJU.

Allocation Considerations

From its current site on Empire, WNCN(FM) is short spaced to four other stations. By moving to WTC, two of these short spacings are improved and two are worsened. The two short spacings that are improved are toward WFAS(FM), White Plains, and WIOF(FM), Waterbury, Connecticut. Short spacings are worsened toward WAEB(FM), Allentown, and WYXR(FM), Philadelphia. These short spacings are worsened by 2.32 kilometers and 4.24 kilometers, respectively. No new short spacings will be created. An allocation study is included herein as Table I.

Utilizing the provisions of §73.213(a) of the Commission's rules, Class proposes to operate with reduced power so that the 60 dBu contour from the proposed operation does not extend beyond WNCN(FM)'s present 60 dBu contour toward the 60 dBu contours of the short spaced stations. As shown in Table II and Figure 3, operation from the WTC site with a non-directional effective radiated power of 3,600 Watts at an effective height of 432 meters provides the required protection. The clearances between contours for station WFAS(FM) are shown as negative numbers in Table II because the 60 dBu contours of the two stations currently overlap and will continue to overlap, although to a much lesser degree, under the proposed operation.

Coverage Contours

The predicted coverage contours were calculated in accordance with the provisions of §73.313 of the FCC rules. The average elevations from 3 to 16 kilometers from the proposed site on eight radials angularly spaced at 45-degree intervals were determined from the NGDC 30-second terrain elevation database. All eight radials pass through the city of New York.

The antenna radiation center height above average terrain in the individual radial directions and the effective radiated power were used in conjunction with the F(50,50) curves of §73.333 of the FCC rules to determine the distances to the 70 dBu and 60 dBu contours. Figure 4 is a map showing the predicted coverage contours.

Also shown in Figure 4 are the city limits of New York. Line-of-sight exists from the proposed antenna location to the entire city.

Coverage of 70 dBu Contour

A map comparing the 70 dBu coverage of both the existing and proposed operation is included as Figure 5. Both contours fail to cover a portion of Staten Island, although the proposed operation would substantially reduce the unserved area.

The land area not receiving 70 dBu service from the current WNCN(FM) signal is approximately 11.1 square kilometers, or 1.4 percent of New York's land area. Assuming uniform distribution of population on Staten Island, the excluded population is approximately 27,925 persons, or 0.4 percent of the population of New York.

The area that would not receive 70 dBu service from the proposed operation is reduced to approximately 1.7 square kilometers, or 0.2 percent of New York's land area. The excluded population would be reduced to approximately 3,989 persons, or 0.05 percent of the population of New York.

Class' proposed operation would reduce the land area and the population [redacted]

Using the formulas contained in the Commission's OST Bulletin No. 65, the worst-case field from the operation proposed herein is 44 percent of the 1 mW/cm^2 ANSI guideline. The worst-case fraction of the recommended levels for all transmitters operating simultaneously is therefore 44 percent plus 25 percent, or 69 percent. The actual radiation from the proposed additional FM signal is expected to be much less than the worst-case value. The proposed construction would, therefore, not come within §1.1307 of the Commission's Rules such that it would have significant environmental impact, including exposure to radio frequency radiation.

As mentioned elsewhere, it will be necessary to make minor modifications to the WTC FM combiner system to accommodate the proposed operation. At that time, the applicant will make spurious output measurements on the modified combiner system. The combiner will be designed and adjusted to insure that no spurious outputs exceed the Commission's requirements. Though no interference to existing stations is anticipated, the licensee agrees to take steps as required by the Commission's Rules to eliminate interference.

Population and Area

The population to be served within the predicted 60 dBu contour was determined by using a computer program that assumes uniform distribution of population within the rural area of each county division and uniform distribution in cities and urbanized areas. The 1980 census was used and the population was determined to be 13,579,774 persons. The area within the 60 dBu contour is 7,375 square kilometers.

Certification

I, Robert D. Herman, certify that I am President and General Manager of RF Projects Corporation, a Telecommunications Consulting Firm with offices in Raleigh, North Carolina; that I am a Technical Consultant with more than twenty years experience; that my qualifications are known to the Federal Communications Commission; and that I have been retained by Class Entertainment and Communications, L.P., to prepare this Exhibit.

I further certify that the calculations and drawings contained herein were prepared by me personally or under my direction; and that all facts contained herein are true of my knowledge except where stated to be on information or belief, and those facts are believed to be true.

Robert D. Herman
March 29, 1991

Subscribed and sworn to before me this 2nd day of April 1991.

Barbara M. Oram Notary Public

My Commission expires August 31, 1994

RF PROJECTS corporation

RF Projects Corp.
Raleigh, NC

March 17, 1991

Constraints Study FM Channel 282B

Title: Class Entertainment Study
Reference City: New York, NY

Latitude: 40-42-43
Longitude: 74-00-49
FCC Database: 910207

Call / City of License	Auth	Licensee Name / St FCC File No.	Chan / Freq	ERP-kW / EAH-m	Latitude / Longitude	Az-to / -from	Dist (km)	Req (km)
WRTN New Rochelle	LIC	Hudson Westchester Ra NY BLH-841023CR	228A 93.5	2.95 101	40-57-45 73-50-32	27.3 207.4	31.36 16.36	15 CLEAR
WNNJFM Newton	LIC	Group M Communication NJ BLH-3542	279B1 103.7	5.0 43	41-02-27 74-44-19	301.2 120.7	71.20 0.20	71 CLOSE
WNNJFM Newton From channel 279B	CP MOD	Group M Communication NJ BMPH-890929IT	279B1 103.7	3.5 231	41-11-33 74-45-13	310.9 130.4	82.04 11.04	71 CLEAR
WFASFM White Plains	LIC	CRB of Westchester, I NY BMLH-860403KG	280A 103.9	0.60 204	41-01-32 73-49-39	24.1 204.2	38.20 -30.80	69 SHORT
WRCNFM Riverhead	LIC	East Shore Broadcasti NY BLH-870609KB	280A 103.9	1.50 142	40-51-07 72-45-55	81.2 262.0	106.52 37.52	69 CLEAR
WIBFFM Jenkintown	LIC	William L Fox and Irw PA BLH-870408KA	280A 103.9	0.34 305	40-02-26 75-14-20	234.7 53.9	128.01 59.01	69 CLEAR
WAEBFM Allentown	LIC	CRB Broadcasting of P PA BLH-7006	281B 104.1	50. 152	40-43-13 75-35-44	270.9 89.9	133.67 -35.33	169 SHORT
WIOF Waterbury AMENDED 871029	LIC	Greater Connecticut B CT BLH-880223KK	281B 104.1	18.0* 255	41-33-41 72-50-39	45.7 226.4	136.16 -32.84	169 SHORT
WBSB Baltimore	LIC	Scripps-Howard Broadc MD BLH-7883	282B 104.3	50. 128	39-25-46 76-27-01	236.3 54.7	251.97 10.97	241 CLEAR
WKGW Utica	CP	Oneida Communications NY BPH-890405IC	282B 104.3	100. 151	43-03-27 75-25-04	336.4 155.5	285.40 44.40	241 CLEAR
WKGW Utica GRANDFATHERED AT 100KW @ 152M HAAT	LIC	Oneida Communications NY BMLH-800505AC	282B 104.3	100. 152	43-03-27 75-25-04	336.4 155.5	285.40 44.40	241 CLEAR
WYXR Philadelphia	LIC	Kiss Limited Partners PA BLH-880225KE	283B 104.5	16.0 266	40-02-30 75-14-24	234.7 53.9	128.01 -40.99	169 SHORT
WSPK Poughkeepsie	LIC	Lance Communications, NY BLH-840802CR	284B 104.7	7.4 381	41-29-19 73-56-52	3.6 183.7	86.43 12.43	74 CLEAR

Table I

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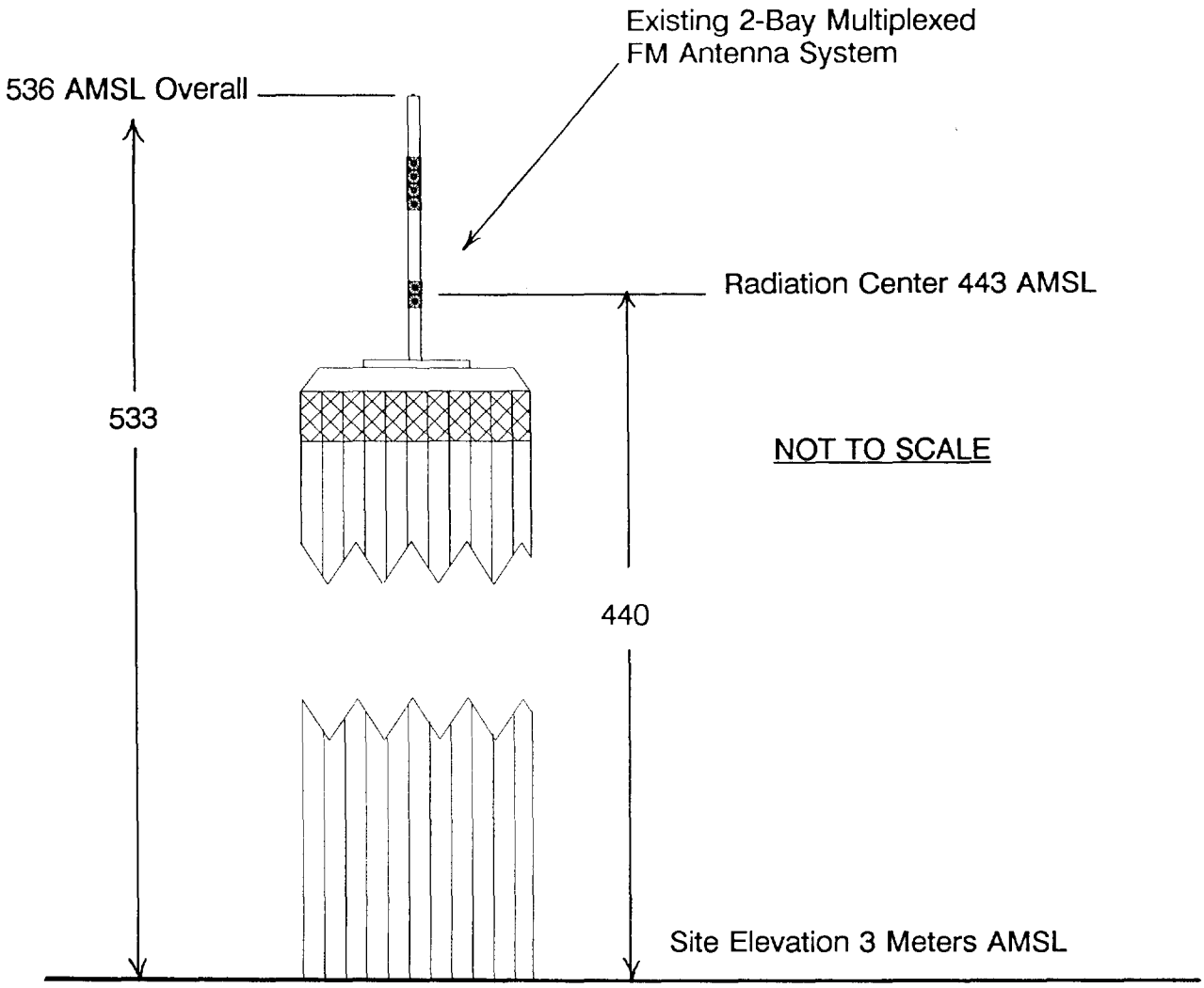


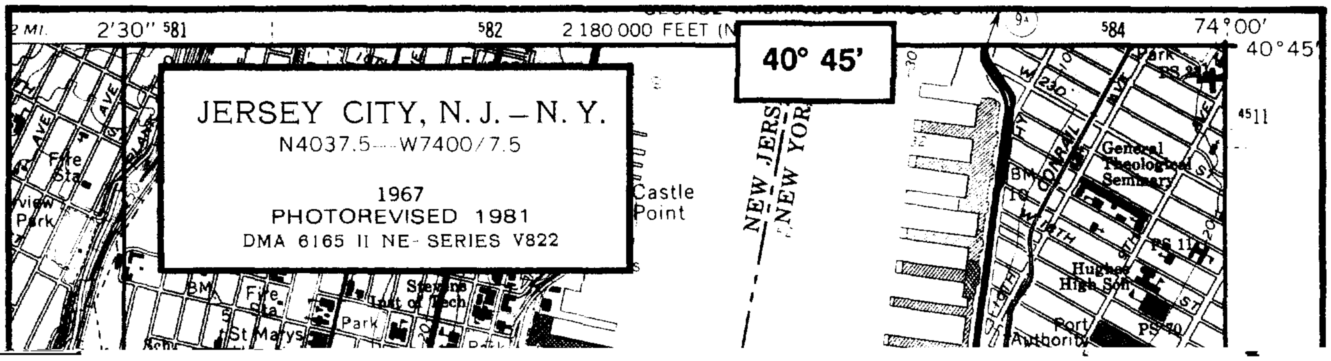
ALL DIMENSIONS IN METERS

Figure 1

March, 1991

PROPOSED ANTENNA AND SUPPORTING STRUCTURE
Class Communications and Entertainment, L.P.
New York, New York
Ch 282B 3.6 kW 432 meters

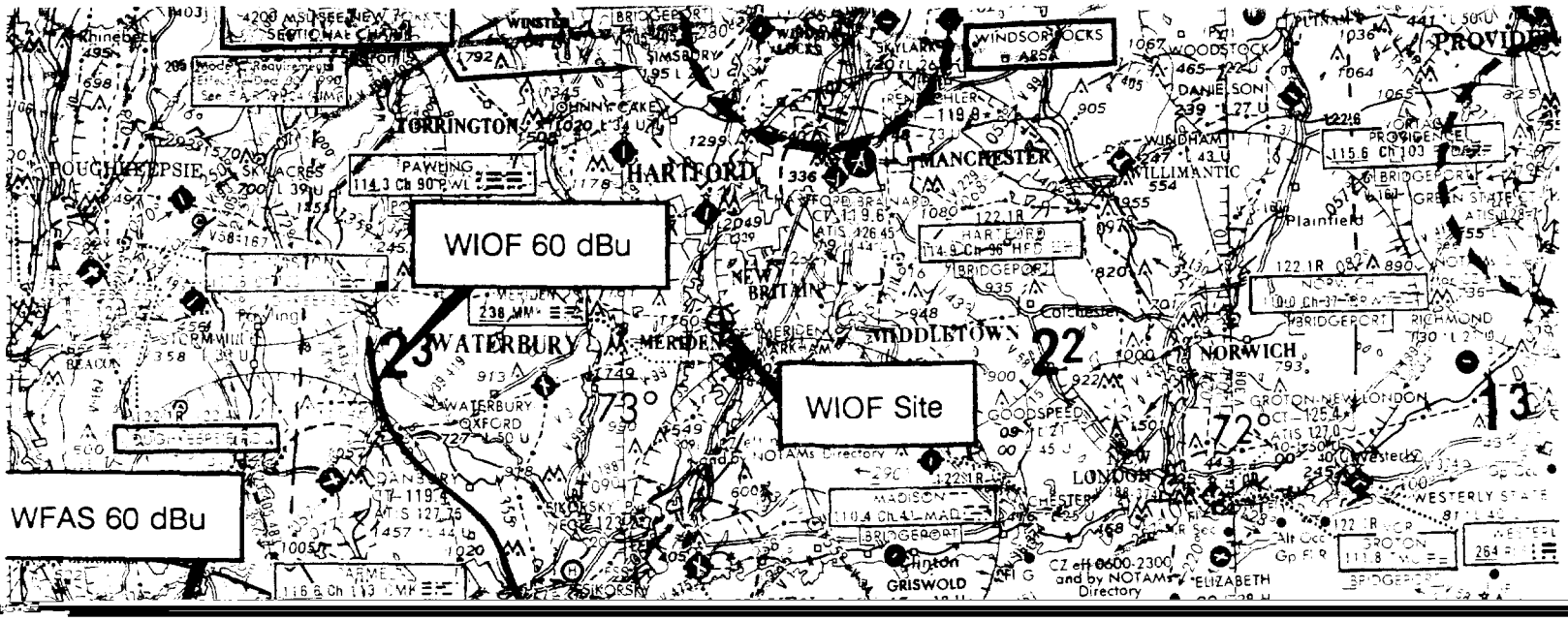
RF PROJECTS corporation

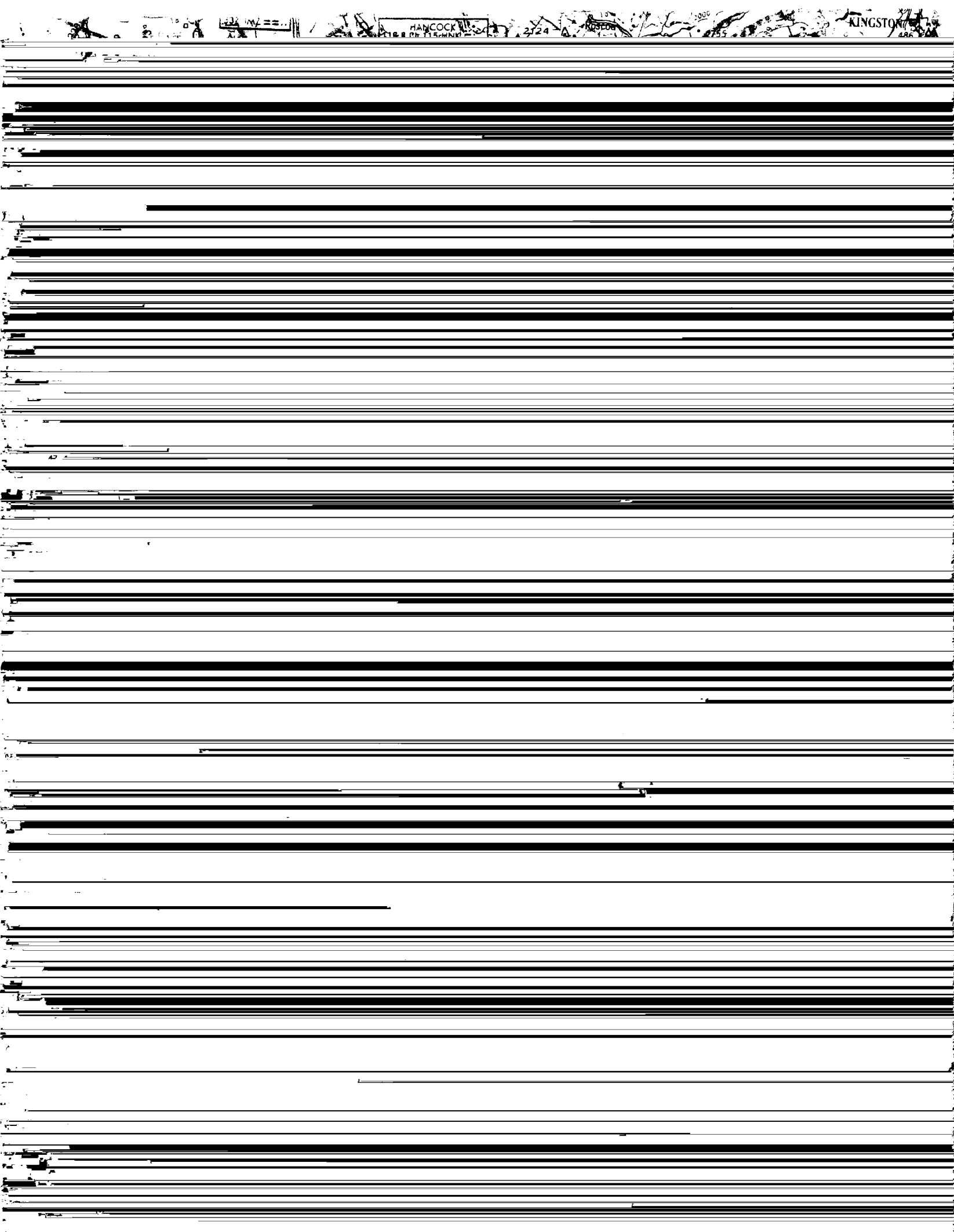

JERSEY CITY, N. J. – N. Y.
N4037.5—W7400/7.5
1967
PHOTOREVISED 1981
DMA 6165 II NE–SERIES V822
40° 45'
2'30"
2 180 000 FEET
74°00'
40°45'
Castle Point
NEW JERSEY
NEW YORK
General Theological Seminary
Hughes High Sch
Port Authority
Fire Sta
St Marys
Park

Short Spacing Study, Class Entertainment and Communications, L.P.

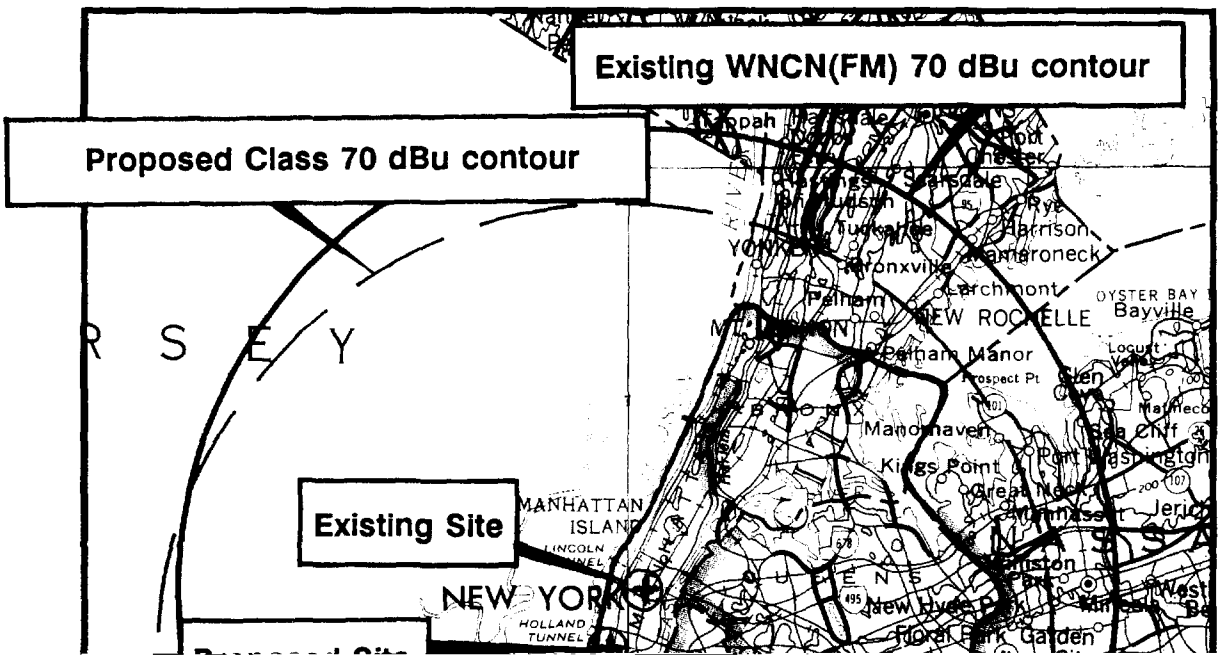
Station Location	WAEB Allentown	WYXR Philadelphia	WFAS White Plains	WIOF Waterbury, Ct
Distance from Existing WNCN Transmitter Site (km)	135.99	132.25	33.56	131.69
Bearing from Existing WNCN Site (degrees)	269.2	233.9	23.3	46.2
Distance to Existing WNCN 60 dBu contour (km)	52.2	53.3	52.1	52.9
Distance to Station 60 dBu contour (km)	56.6	50.0	23.9	42.3
Existing clearance between 60 dBu contours (km)	**27.19**	**28.95**	**-42.44**	**36.49**
Distance from Proposed Class Transmitter Site (km)	133.67	128.01	38.20	136.16
Bearing from Proposed Class Site (degrees)	270.9	234.7	24.1	45.7
Distance to Proposed Class 60 dBu contour (km)	48.7	48.7	48.4	49.1
Distance to Station 60 dBu contour (km)	56.6	50.1	23.8	42.5
Proposed clearance between 60 dBu contours (km)	**28.37**	**29.21**	**-34.00**	**44.56**

Table II **RF Projects Corporation** **March, 1991**


WIOF 60 dBu
WIOF Site
WFAS 60 dBu
HARTFORD
WATERBURY
MIDDLETOWN
NORWICH
MANCHESTER
TORRINGTON
NEW BRITAIN
MERIDEN
WINDSOR LOCKS
GROTON-NEW LONDON
WESTERLY STATE
PROVIDENCE
WILLIMANTIC
Plainfield
GRISWOLD
ELIZABETH
CZ eff 0600-2300 and by NOTAMs
Directory
22
23
73°
72°


HANCOCK
KOSCIO
KINGSTON


Warwick
Monroe
R5206
PEERSKILL


Existing WNCN(FM) 70 dBu contour
Proposed Class 70 dBu contour
Existing Site
MANHATTAN ISLAND
NEW YORK
HOLLAND TUNNEL
LINCOLN TUNNEL
Yonkers
Harrison
Mamaroneck
Larchmont
NEW ROCHELLE
OYSTER BAY
Bayville
Pelham Manor
Prospect Pt
Manhasset
Kings Point
Great Neck
Floral Park
Garden